



extension until February 24, 2025, to file an answer, motion, or otherwise respond to Plaintiff's Amended Complaint.

4. Plaintiff is subject to an Arbitration Agreement. The additional time until February 24, 2025, would also allow the Parties to have meaningful discussions regarding Plaintiff's obligations under the Arbitration Agreement.

5. The undersigned counsel conferred with Plaintiff on January 30, 2025, via telephone and asked if Plaintiff would oppose Defendants seeking an extension from the Court to respond to his Amended Complaint. Plaintiff refused to agree to an extension of time.

6. Defendants file this Motion in advance of the expiration of the response deadline. This motion is made in good faith and not for the purposes of undue delay. If the Court grants this opposed motion, no other deadlines in this case will be impacted.

WHEREFORE, Defendants respectfully move this Court to extend the time in which it may respond to Plaintiff's Amended Complaint by three weeks, to February 24, 2025.

Dated: January 31, 2025

Of Counsel:

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Respectfully submitted,

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**ATTORNEYS FOR DEFENDANTS  
G&A OUTSOURCING III, LLC,  
ONPOINT LAB, L.L.C., AND  
CHANDRESH PATEL**

**CERTIFICATE OF CONFERENCE**

I hereby certify that on the 30th day of January, 2025, I conferred with counsel via telephone as to whether Plaintiff was opposed or unopposed to the filing of this motion and Plaintiff confirmed that he is opposed to filing same.

/s/ Daniel Coolidge  
Daniel Coolidge

**CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2025, a true and correct copy of the foregoing was electronically filed and served on all counsel of record by the Court's ECF system, including:

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/s/ Daniel Coolidge  
Daniel Coolidge